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Attorneys for Defendant Samsung Electronics America, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., and
PATRICIA CAULEY, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., and SONY ELECTRONICS INC.,

Defendants.

Civil Action No. 17-01775 (MCA) (SCM)

Document electronically filed

**DECLARATION OF
MICHAEL R. MCDONALD, ESQ. IN
SUPPORT OF APPLICATION FOR
ADMISSION *PRO HAC VICE* OF
KATHARINE GOODLOE, ESQ.**

I, **MICHAEL R. MCDONALD**, of full age, declare, under penalty of perjury, as follows:

1. I am a Director of Gibbons P.C., and I submit this declaration to the Court in support of Defendant Samsung Electronics America, Inc. (“SEA”)’s application for an Order granting Katharine Goodloe, Esq. admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

2. I am a member in good standing of the bars of the State of New Jersey, the Commonwealth of Pennsylvania, the United States District Court for the District of New Jersey, and the United States Court of Appeals for the Third Circuit.

3. On or about November 20, 2018, my office spoke with counsel for Plaintiffs who consented to the admission *pro hac vice* of Katharine Goodloe, Esq. in this matter.

4. If the Court grants SEA's application for the admission *pro hac vice* of Katharine Goodloe, Esq., I or another member of Gibbons P.C. who is a member in good standing of the bars of the State of New Jersey and the United States District Court for the District of New Jersey will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be present for all appearances before the Court unless previously excused from appearing by the Court, will be responsible for the conduct of this action and for the conduct of Katharine Goodloe, Esq. and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

5. For the foregoing reasons and those set forth in the Declaration of Katharine Goodloe, Esq. submitted herewith, it is respectfully requested that the Court execute and direct the entry of the attached Order admitting Katharine Goodloe, Esq. *pro hac vice* for the purpose of representing SEA in this litigation.

I declare under penalty of perjury that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: December 4, 2018

By: s/ Michael R. McDonald
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